2 ERVEN T. NELSON, ESQ. 3 NEVADA BAR #2332 900 Las Vegas Blvd. South, Suite 802 4 Las Vegas, NV 89101 5 T: 702-498-9111 ervnelson6@gmail.com 6 Attorneys for Third-Party Plaintiffs 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA CHRISTENSEN LAW OFFICES, LLC, 10 Plaintiff, VS. 11 ERIC CHRISTENSEN and ELMINA ANN 12 CHRISTENSEN and DOES I-V, and ROE 13 CORPORATIONS I-V, inclusive, Defendants, 14 ERIC CHRISTENSEN and ELMINA ANN 15 CHRISTENSEN, 16 Third Party Plaintiffs, VS. 17 GEICO, GOVERNMENT EMPLOYEES 18 INSURANCE COMPANY, a foreign corporation, WINNER & SHERROD, LTD. f/ka/ ATKIN 19 WINNER & SHERROD, LTD, a Nevada 20 limited-liability company, BRUCE W. KELLEY, an individual, ROE Insurance Companies I through V, 21 and DOES I-V, inclusive,

Third Party Defendants.

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CASE NO: 2:21-cy-00424-JCM-BNW

## STIPULATION TO EXTEND TIME TO FILE RESPONSE (FIRST REQUEST)

IT IS HEREBY STIPULATED among the parties signing below, by and through their respective counsel of record, that the time for filing of Plaintiff's and Third-Party Plaintiffs' Responses to Defendant's Motion to Dismiss Third-Party Complaint as to Winner & Sherrod, LTD., and Bruce Kelley, Only (filed March 16, 2021, as Document #5), shall be extended by fourteen (14) days. The reason for the extension is that the Plaintiff and the Third-Party Plaintiffs each intend to file a Motion for Remand as they do not agree that the Court has jurisdiction to hear this instant Motion. This is the first request to extend time related to this pending Motion. The Motion has not been scheduled for hearing, although a hearing has been requested. The parties hereto agree that Plaintiff's and Third Party Plaintiffs' responses will now be filed on or before April 13, 2021.

Date: March 30, 2021

CHRISTENSEN LAW OFFICES

<u>/s/ Thomas F. Christensen</u>

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Date: March 30, 2021

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WINNER & SHERROD, LTD. f/ka/ ATKIN WINNER & SHERROD, LTD. and

BRUCE W. KELLEY

**ORDER** 

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

allus C. Mahan

Dated: April 7, 2021

/s/ Erven T. Nelson

ERVEN T. NELSON, ESQ.

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Date: March 30, 2021

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